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November 14, 2002



Ms. Gwen Zervas, P.E.
Case Manager
Bureau of Federal Management
New Jersey Department of Environmental Protection
401 East State Street
P.O. Box 028
Trenton, New Jersey 08625

RE: Ventron-Velsicol Superfund Site RI/FS Progress Report – October 2002

Dear Ms. Zervas:

This Progress Report is submitted in accordance with Section 4.2 of the Agency approved *Remedial Investigation/Feasibility Study (RI/FS) Work Plan* and summarizes activities which took place during October 2002, and also describes activities anticipated for November of 2002.

Activities Performed during the Reporting Period

The draft *Human Health Risk Assessment* (HHRA) and *Baseline Ecological Risk Assessment* (BERA) were submitted on April 27, 2001. Agency comments to the HHRA were received on September 21, 2001, and a response was submitted on November 2, 2001. Agency comments to the November 2, 2001 response were received on May 24, 2002. A response to the May 24, 2002 comments was submitted on June 28, 2002.

The Agencies provided formal comments to the revised RI Report on February 2, 2001. Certain comments were addressed as part of the HHRA and BERA. A response to the remainder of the comments was submitted to the Agencies in a May 10, 2001 letter. Comments regarding the May 10, 2001 response to comments were provided by the NJDEP on November 8, 2001, and were subsequently revised in correspondence, dated April 18, 2002. A response to the April 18, 2002 comments was submitted on May 22, 2002. In addition, a work plan for supplemental groundwater sampling and soil assessment was initially submitted on May 30, 2002, and was subsequently revised and resubmitted on June 11, 2002. On August 28, 2002, the Agencies provided comments and conditional approval to the May 22 and May 30, 2002 submittals.

The Agency approved Supplemental Groundwater Sampling and Soil Assessment began and was partially completed during the month.

Summary of Findings

No findings occurred during this reporting period.

Project Schedule Changes

A revised RI/FS project schedule for OU1 was submitted to the Agencies on December 8, 2000. This schedule indicated that both Risk Assessments were to begin by December 1, 2000, and the Feasibility Study would be completed by June 2002. However, the schedule was subsequently amended during an October 21, 2001 conference call with the Agencies when it was agreed that the overall project schedule would be revised in the future.

Pursuant to the Agencies' April 18, 2002 RI Report comments, the supplemental groundwater sampling and soil assessment was initiated during the month, the scope of which had been conditionally approved by the Agencies on August 28, 2002. A delay of several weeks in the supplemental groundwater and soil investigation occurred as a result of the refusal of an adjoining property owner to honor an existing access agreement which would have permitted the installation of soil borings. (The property owner subsequently agreed to honor the access agreement, but not before the contractor had to demobilize; see comments below)

Deliverables Submitted during the Reporting Period

The following was submitted during the reporting period.

The monthly RI/FS Progress Report.

Summary of Problems or Delays

The owner of a property adjoining Operable Unit One refused to honor an access agreement which had previously been granted to allow the installation of soil borings. As a result, the supplemental investigation was not completed as scheduled. No other problems or delays occurred during the month.

Actions to Correct Problems or Delays

Discussions were subsequently held with the owner of the property adjoining Operable Unit One who had refused to honor an existing access agreement. The owner ultimately agreed to honor the access agreement which will enable the remaining off-site borings to be installed. The contractor rescheduled the field work and will remobilize and complete the remaining investigative work in November.

Work Planned for the Next Reporting Period

The following work is planned for the next reporting period.

- Remaining Field work for the supplemental groundwater sampling and soil assessment will be completed.
- Begin to address any questions or comments received from the NJDEP regarding the BERA.

Key Personnel Changes

There were no personnel changes during the month.

Changes in Scope of Work

No changes in the project scope occurred during this reporting period.

Sincerely,

Kenneth A. Walanski, P.E. Remediation Projects Manager Rohm and Haas Company

cc: Seth Ausubel – USEP Region II
Ron Lantzy – Rohm and Haas
J. Neglia – Borough of Wood-Ridge
Jay Steinberg – LePetomane II, Inc.
Tom Terp – Taft, Stettinius and Hollister
Matt Yunaska – Rohm and Haas
Margie Bazany – Rohm and Haas